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*Representing the United States of America*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
vs.  
  
STEPHEN THOMAS PARSHALL,  
  
Defendant.

2:20-cr-00308-JAD-DJA

**Stipulation to Extend Deadline to File  
Trial Memorandum**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Bianca R. Pucci and K. Nicholas Portz, Assistant United States Attorneys, counsel for the United States of America, Robert M. Draskovich, Jr., Esq., attorney for the defendant Stephen Thomas Parshall, that the Trial Memorandum deadline currently scheduled for 12:00 p.m. on Monday October 17, 2022, be extended to 12:00 p.m. on Thursday October 20, 2022. This Stipulation is entered into for the following reasons:

1. The initial calendar call date was advanced by the Court from October 24, 2022 to October 17, 2022. *See* ECF No. 36.

1           2.       The trial order was issued on October 11, 2022, ordering that the Trial  
2 Memorandum be filed by 12:00 p.m. on Monday October 17, 2022. Multiple other filings are  
3 also due on October 17, 2022 at 12:00 p.m., to include the parties witness lists, exhibits lists,  
4 proposed voir dire, and proposed jury instructions.

5           3.       The government needs additional time to adequately prepare and brief issues that  
6 may arise at trial.

7           4.       The defendant is not required to file a Trial Memorandum, but may do so if he so  
8 chooses.

9           5.       The defendant will not be prejudiced by the additional time requested by the  
10 government as the defendant will not have access to the government's Trial Memorandum until  
11 the day of the start of trial. *See* ECF No. 50.

12          6.       The parties agree to the extension.

13          7.       Additionally, denial of this request for continuance could result in a miscarriage of  
14 justice. The additional time requested by this stipulation is made in good faith and not for  
15 purpose of delay.

16          8.       This is the first request for an extension of the deadline to file the Trial  
17 Memorandum.

18          DATED this 12th day of October, 2022.

19          Respectfully submitted,

20                  For the United States:

For the Defense:

21                  JASON M. FRIERSON  
22                  United States Attorney

ROBERT M. DRASKOVICH, Jr.

23                  /s/ Bianca R. Pucci  
24                  BIANCA R. PUCCI  
K. NICHOLAS PORTZ  
Assistant United States Attorneys

/s/ Robert M. Draskovich, Jr.  
Attorney for Stephen Thomas Parshall

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

STEPHEN THOMAS PARSHALL,

Defendant.

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**Order**

Based on the Stipulation of counsel, good cause appearing therefore, the Court finds that:

1. The initial calendar call date was advanced by the Court from October 24, 2022 to October 17, 2022. *See* ECF No. 36.

2. The trial order was issued on October 11, 2022, ordering that the Trial Memorandum be filed by 12:00 p.m. on Monday October 17, 2022. Multiple other filings are also due on October 17, 2022 at 12:00 p.m., to include the parties witness lists, exhibits lists, proposed voir dire, and proposed jury instructions.

3. The government needs additional time to adequately prepare and brief issues that may arise at trial.

4. The defendant is not required to file a Trial Memorandum, but may do so if he so chooses.

5. The defendant will not be prejudiced by the additional time requested by the government as the defendant will not have access to the government's Trial Memorandum until the day of the start of trial. *See* ECF No. 50.

7. Additionally, denial of this request for continuance could result in a miscarriage of justice.

8. The additional time requested by this stipulation is made in good faith and not for the purpose of delay.

IT IS HEREBY ORDERED that the deadline to file the Trial Memorandum currently scheduled on Monday, October 17, 2022 at the hour of 12:00 p.m., be vacated and continued to Thursday, October 20, 2022 at the hour of 12:00 p.m.

  
HONORABLE JUDGE JENNIFER A. DORSEY